

RONALD SULLIVAN LAW, PLLC

Ronald S. Sullivan Jr.

August 11, 2024

VIA ECF

The Honorable Eric R. Komitee
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 112011

*Re: United States v. Carlos Watson and OZY Media, Inc. Criminal Docket No. 23-82 (EK):
Response to Government's Appeal re Carlos Watson's Bail Pending Sentencing*

Dear Judge Komitee:

Following the hearing before Your Honor on August 9, Kosmas Kalliarekos increased his commitment ten-fold, from \$100,000 to \$1,000,000. An updated affidavit is attached. See Exhibit A.¹ In addition to Mr. Kalliarekos, Dr. Michael Troner, a Watson family friend, increased his commitment from \$25,000 to \$50,000. See Exhibit B.²

We submit that, with the substantial increase of Mr. Kalliarekos's commitment, Mr. Watson has submitted a "meaningfully strengthened bail package," consistent with the thrust of the Court's comments at the August 9th hearing. Mr. Kalliarekos warrants in the attached affidavit that he will not allow the Schwab account to go below \$1m during the pendency of Mr. Watson's release. The remaining sureties who are committing cash and/or accounts will sign whatever contract the parties agree to. In speaking with the government after court on August 9, it represented that the sort of three-party agreement that the Court contemplated is a matter of first impression for them. In this vein, we will be creating a document that is not typically required in the EDNY. That said, the defense will work in good faith on language that satisfies all

¹ Filed under seal.

² Filed under seal.

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parties. With respect to the sureties who put up property, all those encumbrances are properly recorded on the deeds of the respective states.

On this record, the defense respectfully requests that the Court affirm Judge Scanlon's Order as supplemented by Mr. Kalliarekos and Dr. Troner's increased commitment. We further request that the Court release Mr. Watson while the parties finalize agreeable language to secure the accounts of Annye Watson (475b account), Amy Troner (Money Market account), Dr. Michael Troner (Money Market account), and Dr. Jacqueline Mattis (Retirement and Investment accounts, and cash). One additional week should be sufficient for this purpose. We note that each of the foregoing sureties were interviewed, on the record, by Judge Scanlon at which time they committed the various amounts listed in the bond.³ Accordingly, we ask the Court to issue the bond, pursuant to the above supplements, without need for an additional hearing on August 14. Mr. Watson Sr. has another medical procedure on Wednesday, August 14, which Mr. Watson would treasure an opportunity to attend should the Court be inclined to rule.

Pursuant to this Court's standing orders, the defense sought the position of the government to the proposal outlined herein. The government does not consent.

For all the reasons set forth in the defense's August 8 letter, with a particular emphasis on the dangerous and deplorable conditions at MDC, we submit that Mr. Watson has submitted a "meaningfully strengthened bail package," and we urge the court to affirm Judge Scanlon's bond as supplemented herein.

Sincerely,



Ronald S. Sullivan Jr.

³ Dr. Troner has increased his by \$25,000 and signed an affidavit to that effect. See Exhibit B.